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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 15-1507  
v. :  
: HON. DOUGLAS E. ARPERT  
JAMES PAROLINE : **CRIMINAL COMPLAINT**

I, Monica Cueto, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

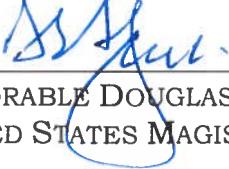
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Monica Cueto, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
on July 7, 2015, at Trenton, New Jersey

  
HONORABLE DOUGLAS E. ARPERT  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

Count One

On or about March 1, 2015, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

JAMES PAROLINE

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

Count Two

On or about March 2, 2015, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

JAMES PAROLINE

did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

**ATTACHMENT B**

I, Monica Cueto, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a Complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part.

1. At all times relevant to this Complaint, defendant JAMES PAROLINE (hereinafter, "PAROLINE") was a resident of Red Bank, New Jersey.

2. Between on or about February 20, 2015 and March 4, 2015, law enforcement agents obtained Internet Protocol ("IP") addresses of certain users of "Website A," an online bulletin board and website dedicated to the advertisement and distribution of child pornography, and the discussion of matters relating to the sexual abuse of children. After successfully registering and logging into the site, a user of "Website A" can access a number of sections, forums, and sub-forums that contain links to child pornography.

3. Based on its investigation, law enforcement has identified one such user of "Website A," who employed the user name "jimbobtropolis." On or about February 26, 2015, March 1, 2015, and March 2, 2015, the user "jimbobtropolis" logged on to "Website A" and accessed materials related to child pornography.

4. On or about February 26, 2015, the user "jimbobtropolis" accessed a post on "Website A" that, among other things, contained a thread between users discussing about a video of young girls kissing and touching one another.

5. On or about March 1, 2015, the user "jimbobtropolis" accessed and downloaded a file from "Website A" that contained approximately 16 thumbnail videos, ranging in duration from approximately 22 seconds to approximately 5 minutes and 58 seconds. Each thumbnail video depicts the same prepubescent Caucasian girl, approximately 6 to 9 years old. The prepubescent female is in different stages of undress and sexually explicit poses. For example, certain of the video files downloaded by "jimbobtropolis" on or about March 1, 2015 contained, among other things, the following images:

- A close-up of the prepubescent girl's exposed genitalia. In the thumbnail, the prepubescent female appears to be inserting her finger into her anus.

- A close-up of a hand inserting what appears to be a flashlight into the prepubescent girl's anus.
- The prepubescent Caucasian girl sitting on a white pad, with her legs spread apart exposing her genitalia, urinating on the pad.

6. On or about March 2, 2015, the user "jimbobtropolis" accessed "Website A" and downloaded approximately 25 video files from "Website A" depicting, among other things, prepubescent Caucasian girls ranging from infancy to approximately 5 years of age. Various images in the video file depict young girls being orally, vaginally, and anally penetrated by adult males and/or with foreign objects. For example, the video files downloaded by "jimbobtropolis" on or about March 2, 2015 contained, among other things, the following images:

- A video depicting a prepubescent Caucasian girl, approximately four years of age, being anally penetrated with a sex toy. In other preview images the same girl is being penetrated by an erect adult penis.
- A video depicting a prepubescent Caucasian girl, approximately three years of age. In several of the images, the girl is being penetrated orally by an adult male penis. In several of the images the girl is seen spitting a white milky substance from her mouth.
- A video depicting a Caucasian prepubescent girl, approximately two years old, naked from the waist down. The girl is observed being penetrated by an adult erect penis.
- A video depicting a Caucasian prepubescent girl, approximately four years old, naked from the waist down. In the initial thumbnail images, the camera is focused on her exposed vagina with an adult set of fingers spreading apart her labia. An adult finger can be seen being inserted into the girl's vagina. In the other thumbnail images, the girl is being penetrated vaginally and orally by an adult male penis.

7. Law enforcement officers determined that the IP Address of the computer used by "jimbobtropolis" on or about February 26, 2015 was assigned to an Internet account registered to an address in Red Bank, New Jersey, at which defendant PAROLINE resided (the "Residence").

8. Open-source queries conducted by law enforcement officers on the name "jimbobtropolis" revealed that defendant PAROLINE has used the user

name "jimbobtropolis" on other Internet websites. On at least one website, the account page for "jimbobtropolis" identified the user as "Jimmy Paroline," i.e., defendant PAROLINE.

9. On or about July 7, 2015, law enforcement officers executed a search warrant at the Residence. The officers recovered computer equipment belonging to defendant PAROLINE, including an external hard drive (the "Hard Drive") connected to defendant PAROLINE's desktop computer. Among the files law enforcement officers located on the Hard Drive were numerous files containing images and videos of child pornography, as defined by Title 18, United States Code, Section 2256(8), including material depicting prepubescent minors engaged in sexual activity. For example, files recovered from the Hard Drive include, but are not limited to, the following:

- An image depicting a prepubescent girl, who appears to be between approximately 6 and 8 years of age. She has olive skin, black hair, and is wearing only black thigh-high stockings. She is straddling what appears to be an adult Caucasian male with an erect penis. The girl is holding the erect penis in her left hand.
- An image depicting the same prepubescent girl. The girl is lying on her back with her arms alongside of her head and her eyes are closed. An adult Caucasian male with an erect penis is on the girl's vagina and possibly slightly inside the vagina. The girl's feet are on the male's stomach.
- An image depicting an adult Caucasian male holding what appears to be his erect penis in his left hand. The tip of the penis is inside a prepubescent girl's vagina. Only the vagina and lower stomach of the girl are visible.

10. On or about July 7, 2015, during an interview with law enforcement officers, and after being advised of and waiving his *Miranda* rights, defendant PAROLINE admitted, among other things, that (i) he knowingly downloaded images of child pornography from "Website A" using the user name "jimbobtropolis"; (ii) he was the sole user of the "jimbobtropolis" user name on "Website A"; and (iii) the Hard Drive from which law enforcement officers recovered images of child pornography belonged to him.

11. Also on or about July 7, 2015, during an interview with law enforcement officers, defendant PAROLINE admitted that, while employed as a teacher at a nursery school located in or around Monmouth County, New Jersey ("School 1") and as a summer camp counselor at a private school located in or around Monmouth County, New Jersey ("School 2"), he has inappropriately touched minor children.

12. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images and videos described in paragraphs 5, 6, and 9 above traveled in interstate commerce and were produced using materials that were mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the images were downloaded from the Internet, based upon, among other things, their presence on defendant PAROLINE's computer equipment, and law enforcement's knowledge that defendant PAROLINE received these images through an Internet website.